

# **Exhibit**

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## David Berlin

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*Via email to Shohjahon Ergashev ([shohhhh00@mail.ru](mailto:shohhhh00@mail.ru))*

September 7, 2020

Dear Mr. Ergashev:

I represent Dmitriy Salita and Salita Promotions Corp. (“SP”), a boxing promotional company. As you know, since you are a party to the agreement, SP entered into an exclusive promotional agreement (“EPA”) with you on November 17, 2017. The EPA has an initial term of five years and therefore remains in full legal force and effect.

It has come to our attention that your manager, Oleg Bogdanov, is attempting to arrange a bout for you on September 21, 2020 in St. Petersburg to be broadcast on Match TV. Any attempt to move forward with the scheduling of or participation in this bout will constitute a breach of the EPA and will necessitate legal action against you, your manager, the event’s promoter and Match TV. The EPA is clear that SP is your exclusive promoter and “grants Promoter the sole and exclusive right to secure and arrange all bouts” for you. As you are legally bound by the EPA, any attempt to arrange a bout outside of the EPA is not permitted. If we are forced to bring legal action against you and your manager, we intend to seek substantial damages for the financial and reputational loss caused by your breach.

Please be aware that you may participate in a bout outside of the EPA only with the express written consent of SP. If you have an opportunity for a bout outside of the EPA, you may present that opportunity to SP in order for SP to determine whether it will consent to such bout. It is of course SP’s mission to further your professional boxing career and it will consider any such request with proper deliberation, but you should know that a decision on any such request rests solely and entirely in the discretion of SP. With respect to the bout that Mr. Bogdanov is attempting to arrange on Match TV, you are on notice that SP was not consulted regarding such bout and SP does not consent to such bout.

We hereby formally demand that you immediately cease and desist from this and any further breach of the EPA. Please immediately confirm to me that you have received this letter and will comply with my client’s demands.

Please be advised that this letter does not purport to be a complete statement of the facts or the law with respect to this matter and is without prejudice to any of my client’s rights, interests or remedies at law, in equity or otherwise, all of which are hereby expressly reserved.

Very truly yours,

A handwritten signature in black ink, appearing to read "David Berlin". The signature is written in a cursive, slightly slanted style.

David Berlin

cc. Dmitriy Salita  
Oleg Bogdanov ([ice99@inbox.ru](mailto:ice99@inbox.ru))

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*Via email to Oleg Bogdanov ([ice99@inbox.ru](mailto:ice99@inbox.ru))*

September 8, 2020

Dear Mr. Bogdanov:

I represent Dmitriy Salita and Salita Promotions Corp. ("SP"), a boxing promotional company. It has come to our attention that you have betrayed a long-standing relationship with SP. In addition to your most recent moves in Russia of attempting to put Shohjahon Ergashev on a September 21 card in St. Petersburg (in breach of his exclusive promotional agreement ("EPA")), and arranging for Aslambek Idigov to fight on a September 4 card in Grozny (in breach of his EPA), you have also attempted to speak with promoters in the United States and elsewhere about fighters who are signed to EPAs with SP. This includes conversations about Mr. Ergashev, who is bound by a long-term exclusive promotional deal with SP, with major promoters in the United States.

Your bold actions are unlawful and jeopardize your standing in the boxing community and in the United States. You helped to arrange for many of the fighters you manage to sign exclusive promotional agreements with SP, relationships that have benefitted and advanced the careers of these fighters, gaining them national and worldwide recognition and exposing them to vast TV audiences in the United States and elsewhere. Now you are actively orchestrating those same fighters' breaches of their EPAs and aggressively interfering with SP's rights under those EPAs. You have not only broken a bond of trust with SP in the hope of some short term gain for yourself but you are damaging the careers of fighters to whom you have a fiduciary duty. More relevant to SP, you are interfering with valid, extant contracts that SP has with many fighters whom you manage, and you are causing SP substantial and irreparable financial and reputational damage.

As you must realize, SP will protect its interests to the fullest extent of the law and will not stand idly by as you pursue your nefarious schemes with respect to fighters signed to SP. Toward that end, we hereby formally demand that you immediately cease and desist from any further interference with SP's exclusive contractual rights and with the EPAs that SP has with the fighters whom you manage. Please immediately confirm to me that you have received this letter and will comply with my client's demands.

Please be advised that this letter does not purport to be a complete statement of the facts or the law with respect to this matter and is without prejudice to any of my client's rights, interests or remedies at law, in equity or otherwise, all of which are hereby expressly reserved.

Very truly yours,

A handwritten signature in black ink that reads "David Berlin". The signature is written in a cursive, slightly slanted style.

David Berlin

cc. Dmitriy Salita  
Shohjahon Ergashev ([shohhhh00@mail.ru](mailto:shohhhh00@mail.ru))  
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